

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DR. RAY L. NANNIS, P.C., dba OPTIMUM
WELLNESS SOLUTIONS, a Texas corporation;
and DR. RAY L. NANNIS, an individual,

Defendants.

Civil Action No. 3:20-cv-00940-B

AGREED JUDGMENT OF PERMANENT INJUNCTION

Before the Court is the Agreed Motion for Entry of Judgment of Permanent Injunction agreed to by the United States and Defendants Dr. Ray L. Nannis, P.C., dba Optimum Wellness Solutions, and Dr. Ray L. Nannis. Pursuant to that Motion and, further, pursuant to Rules 58 and 65 of the Federal Rules of Civil Procedure, the Agreed Motion should be and hereby is **GRANTED**.

Accordingly, **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** as follows:

1. This Court has jurisdiction over the subject matter and all parties to this action.
2. This Court has authority pursuant to 18 U.S.C. § 1345, and inherent authority, to order injunctive and other equitable relief to address Defendant's conduct as identified in the Complaint.
3. Defendants have waived all rights to seek judicial review or otherwise challenge or contest the validity of this order.

4. Defendants have consented to entry of this order without trial or adjudication of any issue of law or fact herein and have agreed that entry of this order by the Court and its filing by the Clerk will constitute notice to them of the terms and conditions of the order.

5. Upon entry of this order, Defendants and each and all of their directors, officers, agents, representative, employees, attorneys, successors and assigns, and any and all persons or entities in active concert or participation with any of them, are permanently restrained and enjoined from offering to treat, cure, prevent, or otherwise mitigate the impact of the novel Coronavirus or COVID-19, including, in particular, in connection with any “homeopathy” or “homeoprophylactic,” and shall remove, delete, and take down any representations regarding the same.

6. Should the United States bring and prevail in a contempt action to enforce the terms of this order, Defendants shall, in addition to other remedies, reimburse the United States for its attorneys’ fees, expert witness fees, travel expenses incurred by attorneys and witnesses, investigational and analytical expenses, administrative and court costs, and any other costs or fees relating to such contempt proceedings.

7. Except as provided in the foregoing provisions of this order, the parties shall bear their own costs and attorneys’ fees in this action.

8. This Court retains jurisdiction over this action and the parties thereto for the purpose of enforcing and modifying this order and for the purpose of granting such additional relief as may be necessary or appropriate.

SO ORDERED, this the ____ day of _____, 2020

JANE J. BOYLE
UNITED STATES DISTRICT JUDGE

The proceeding Judgment and Order is agreed to in form and substance.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

Date: April 27, 2020

/s/ Andrew S. Robbins
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Date: April 27, 2020

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